

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
FRANK HICKS	:	VIOLATIONS:
	:	18 U.S.C. § 2113(a) (bank robbery - 5 counts)
		18 U.S.C. § 2113(d) (bank robbery - 1 count)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 30, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Wachovia Bank lawful currency of the United States, that is, approximately \$2,838.00 belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 13, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the PNC Bank lawful currency of the United States, that is, approximately \$2,190.00 belonging to, and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the M&T Bank lawful currency of the United States, that is, approximately \$520.25 belonging to, and in the care, custody, control, management and possession of the M&T Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 20, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Hudson United Bank lawful currency of the United States, that is, approximately \$5,060.00 belonging to, and in the care, custody, control, management and possession of the Hudson United Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 28, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Citizens Bank lawful currency of the United States, that is, approximately \$2,362.00 belonging to, and in the care, custody, control, management and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant FRANK HICKS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Bank, and other persons, by use of a dangerous weapon, that is, a simulated handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2004, in the Eastern District of Pennsylvania,
defendant

FRANK HICKS

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Polonia Bank lawful currency of the United States, approximately \$793.00 belonging to, and in the care, custody, control, management and possession of the Polonia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

Notice of Additional Factors

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One through Six of this indictment, defendant FRANK HICKS:

a. Took the property of a financial institution, as described in U.S.S.G. § 2B3.1(b)(1).

2. In committing the offenses charged in Counts Four, Five, and Six of this indictment, defendant FRANK HICKS:

a. Made a threat of death, as described in U.S.S.G. § 2B3.1(b)(2)(F).

3. In committing the offense charged in Count Five of this indictment, defendant FRANK HICKS:

a. Brandished or possessed a dangerous weapon, as described in U.S.S.G. § 2B3.1(b)(2)(E).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**